

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, California 95812-3044

From: Department of Toxic Substances Control
Brownfields Restoration and School
Evaluation Branch
5796 Corporate Avenue
Cypress, California 90630

Project Title: Removal Action Workplan, 16539 South Main Street		
Project Address: 16539 South Main Street	City: Carson	County: Los Angeles
Approval Action Under Consideration by DTSC:		
<input checked="" type="checkbox"/> Removal Action Workplan	<input type="checkbox"/> Initial Permit Issuance	<input type="checkbox"/> Permit Re-Issuance
<input type="checkbox"/> Corrective Measure Study/Statement of Basis	<input type="checkbox"/> Permit Modification	<input type="checkbox"/> Closure Plan
<input type="checkbox"/> Remedial Action Plan	<input type="checkbox"/> Regulations	<input type="checkbox"/> Interim Removal
<input type="checkbox"/> Other (specify):		
Statutory Authority:		
<input type="checkbox"/> California H&SC, Chap. 6.5 <input checked="" type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify):		

Project Description: The project involves the approval of the Removal Action Work Plan (RAW) for soil, soil vapor, and groundwater containing trichloroethylene (TCE) at 16539 South Main Street, Carson, CA 90248 (Site). The RAW summarizes historic soil, soil vapor, and groundwater investigations and details the excavation of the former subgrade concrete vault soil located inside the building. In addition, the RAW describes the installation of a soil vapor extraction (SVE) and treatment system and air sparging (AS) system to remediate the TCE and other breakdown volatile organic compounds (VOCs) located at other areas of the Site.

Background: The Site encompasses approximately 1-³/₄ acres located in a light industrial area of the City of Carson. The Site contains an approximately 40,500 square foot industrial building built in 1959. Outside the building to the north and east are parking and loading areas. The Site is currently occupied by tenant Cal-Western Manufacturers which is a contract container filling, blending, and packaging company.

A subgrade concrete vault was formally located inside the building and was used in the 1990s for both maintenance access and containment of leaked hydraulic fluid beneath a large above-ground hydraulic press. The tenant left several years later, and the press and vault were subsequently abandoned in place by being backfilled with soil and re-paved with the concrete slab. Environmental investigations identified low concentrations of hydraulic fluid along with VOCs primarily containing TCE in vault backfill, subsoils, and immediately adjacent shallow soils. Elevated levels of TCE were also found in soil vapor and groundwater outside the vault area indicating possible other sources at the Site.

Environmental investigations also determined the TCE affected not only shallow soils but also soil vapor and possibly the underlying groundwater. The highest concentrations in soil were found adjacent the former vault at a location immediately beneath an area of concrete that had spalled, forming a cracked depression where surface liquids could both accumulate and pass easily through the concrete slab into underlying soils. The extent to which the former vault may have been a source of TCE in the on-Site groundwater, and/or whether an off-Site, up-gradient property (e.g., ANCO Metals) may also have contributed or been responsible for the TCE in groundwater will be established following additional investigation to be conducted on-Site following the excavation of vault material.

Project Activities: Remediation of TCE and other breakdown VOCs at the Site will be accomplished by the implementation of the following activities:

- Saw-cut the concrete floor within the building and remove the concrete in pieces for off-site disposal;
- Excavate approximately 98 cubic yards of contaminated soil from the vault at various depths including:
 - from the surface to 7 feet (24' x 12' x 7' area),
 - from 7 feet to 14 feet (15' x 6' x 7' area), and
 - from 14 feet to 15 feet (1' x 1' x 1' area);
- Load excavated soils into on-site roll-off bins staged in the parking lot during excavation activities;
- Transport roll-off containers to a State-certified recycling or disposal facility under appropriate waste manifest protocols;
- Collect confirmation soil samples;

- Backfill the excavated area with medium to coarse sand to ensure the stability of the excavated area;
- Install additional soil vapor probes and groundwater wells and conduct sitewide investigation;
- Review the confirmation and additional investigation data;
- Install SVE wells (two screened from 5 to 25 feet below ground surface (bgs) and two screened from 25 feet to 50 feet bgs);
- Install AS wells;
- Install SVE/AS equipment including:
 - Blower capable of providing a range of flow rates up to 400 cubic feet per minute (cfm) and vacuum of up to 10 inches of mercury,
 - AS compressor providing flow up to 60 cfm at 30 pounds per square inch (psi),
 - Vacuum-rated air/water separator (knockout tank) with an automatic high-water shutoff to remove condensate from the influent vapor stream,
 - Emissions control equipment consisting of two vapor-phase granular activated carbon vessels connected in series, and
 - Sampling ports between canisters to monitor for VOC breakthrough of the carbon vessels.

The SVE will remove VOCs from soils by applying a vacuum to soils using vertical wells. The AS will vaporize and degrade the contaminants in the groundwater. Activated carbon vessels will be used to filter the vapor extracted from the subsurface prior to discharging to the atmosphere. The project will mobilize a prefabricated skid or trailer-mounted SVE vacuum/blower system and AS system to the Site. The SVE package will be pre-permitted to operate at various locations by the South Coast Air Quality Management District (SCAQMD). The SVE equipment, including the blower and activated carbon vessels, will be housed in the onsite parking area.

It is anticipated that permitting, SVE pipe installation, remediation compound construction, and installation of SVE/AS wells will require approximately 2 to 3 months. The SVE/AS is planned to operate for up to 2 years to meet cleanup objectives (remediate the Site by removing contamination in soil vapor and groundwater to the appropriate regulatory action level or a proposed target cleanup level). A decision to terminate operation of the AS/SVE will be based on its performance and the satisfactory reduction of VOCs in soil, soil vapor, and groundwater. As such, DTSC approval will be required prior to shutting down the AS/SVE.

Approximately 10 truck trips will be required to transport excavated soil to a recycling or disposal facility. Approximately 10 additional truck trips will be required to transport backfill to the Site. Required drilling permits and well permits will be obtained from the Los Angeles County Environmental Health Department. All activities will be conducted between the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday in conformance with the City of Carson Municipal Code.

To minimize dust generation, stockpiled VOC-affected soils will not be kept for extended periods and will be placed promptly into covered roll-off bins/boxes for transport offsite. Soils will be continuously screened by an onsite geologist to quickly identify and segregate affected soils and organic vapor meter (OVM) monitoring will screen the work zone and working area inside the building for concentrations of total VOCs (all work will come to a safe halt and everyone onsite will immediately upgrade to Level "C" Personal Protective Equipment (PPE) if at any time VOCs detections exceed 50 parts per million (ppm)). Water with or without a non-toxic chemical stabilizer will also be used for dust suppression.

In the event cultural or historical resources are discovered in the course of project activities, work will be suspended while a qualified cultural or historical specialist assesses the area and arrangements are made to protect or preserve any resources that are discovered. If human remains are discovered, no further disturbance will occur in the location where the remains are found, and the County Coroner will be notified pursuant to the Health and Safety Code, Chapter 2, Section 7050.5.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: 16539 South Main Street, LLC

Exempt Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
- Categorical Exemption: [CCR Title 14, Sec. 15330]
- Statutory Exemptions: [State Code Section Number]
- Common Sense Exemption [CCR, Sec. 15061(b)(3)]

Exemption Title: Common Sense: It can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.

Reasons Why Project is Exempt:

DTSC has determined with certainty that there is no possibility that the activities in question may have a significant effect on the environment because the project would not result in "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

The project is consistent with applicable state and local environmental permitting requirements including, but not limited to, air quality rules such as those governing volatile organic compounds and water quality standards, and approved by the regulatory body with jurisdiction over the site (City of Carson). The majority of remediation activities (e.g., excavation) would occur indoors and would not have the potential to negatively impact adjacent or nearby receptors, which exclusively include industrial land uses. The limited number of trucks (20 total trips) and limited timeframe for activities (maximum of 4 weeks) would also not have the potential to substantially impact existing truck traffic in the project area.

Evidence to support the above reasons is documented in the project file record, available for inspection at:

Department of Toxic Substances Control
File Room
Site Mitigation and Restoration Program
5796 Corporate Avenue
Cypress, California 90630

https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60002479

Greg Sweel Project Manager	Senior Engineering Geologist Title	714-484-5413 Phone No.
 Branch Chief's Signature		6/18/2021 Date
for Javier Hinojosa Branch Chief	Environmental Program Manager I (Sup) Title	714-484-5484 Phone No.

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: